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Division of Waste Management
Bureau of Land and Waste Management

THRU: David Scaturo, P.E., P.G., Manager *D Scaturo*
Corrective Action Engineering Section

FROM: Stacey French, P.E., DoD Site Coordinator *SF*
Corrective Action Engineering Section
Division of Waste Management
Bureau of Land and Waste Management

DATE: January 20, 2004

RE: Evaluation of U.S. Marine Corps Air Station Status Under
The RCRA Info Corrective Action Environmental Indicator
Event Codes (CA725 and CA750)
EPA ID No. SC1 750 216 169

CC: Matt Tetrault, Corrective Action Engineering
Mike Daniels, RCRA Hydrogeology Section
Caron Falconer, EPA Region 4
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Alice Howard, MCAS
Art Sanford, Naval Facilities Engineering Command Southern Division
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I. PURPOSE OF MEMO

This memo is written to formalize an evaluation of the status of Marine Corps Air Station (MCAS) in relation to the following corrective action event codes defined in the Resource Conservation and Recovery Act Information System (RCRA Info):

- 1.) Current Human Exposures Under Control (CA725),
- 2.) Migration of Contaminated Groundwater Under Control (CA750).

Concurrence by the Manager of the Corrective Action Engineering Section is required prior to entering these event codes into RCRA Info. Your concurrence with the interpretations provided in the following paragraphs and the subsequent recommendations is satisfied by dating and signing at the appropriate location within Attachment 1.

II. HISTORY OF ENVIRONMENTAL INDICATOR EVALUATIONS AT THE FACILITY AND REFERENCE DOCUMENTS

This particular evaluation is the second evaluation for MCAS. The first evaluation is dated September 11, 1998. The results of the earlier evaluation recommended that CA725 NO and CA750 NO be entered into RCRA Info (then RCRIS) due to the fact that human exposures to contamination were not currently controlled for soil, groundwater, and surface water, and also due the uncontrolled migration of contaminated groundwater at the facility.

The results of this evaluation are based on information obtained from the following documents:

1. Final Interim Measure Work Plan for Sign Placement, Marine Corps Air Station Beaufort SC. January 2004. Naval Facility EFT South (NAVFAC).
2. RFI Work Plan SWMU 8, Marine Corps Air Station Beaufort SC. October 2003. Naval Facility EFT South (NAVFAC).
3. RFI Report SWMUs 6 and 14, Marine Corps Air Station Beaufort SC, June 2003. US Army Corps of Engineers.
4. RFI Report SWMUs 1 and 2, Marine Corps Air Station Beaufort SC, May 2003. US Army Corps of Engineers.
5. CS Report SWMU 17, Marine Corps Air Station Beaufort SC, January 2003. US Army Corps of Engineers.
6. CS Work Plan SWMU 77, Marine Corps Air Station Beaufort SC, January 2003. US Army Corps of Engineers.
7. RFA Report SWMU 76 Marine Corps Air Station Beaufort SC, March 2002. US Army Corps of Engineers.
8. RFI Report SWMU 3, Marine Corps Air Station Beaufort SC, December 2000. US Army Corps of Engineers.

9. RFI Report SWMU 4, Marine Corps Air Station Beaufort SC, December 2000. US Army Corps of Engineers.
10. RFI Report AOC C, Marine Corps Air Station Beaufort SC, December 2000. US Army Corps of Engineers.
11. CS Report Addendum SWMU 12, Marine Corps Air Station Beaufort SC, March 2000. US Army Corps of Engineers.
12. RFI Report SWMU 5, Marine Corps Air Station Beaufort SC, August 1999. US Army Corps of Engineers.
13. CS Report SWMUs 12, 17,57, and 67, Marine Corps Air Station Beaufort SC, February 1999. US Army Corps of Engineers.
14. CS Report for Crash Fire Rescue Training Site, Marine Corps Air Station Beaufort SC, July 1997. US Army Corps of Engineers.

III. FACILITY SUMMARY

MCAS Beaufort contains an airfield, operational facilities, and military housing areas. It consists of approximately 6,700 acres in northern Beaufort County, South Carolina. The base currently provides operations and base support for air tactical units of the Fleet Marine Force. The primary tenant of the base is the Marine Air Group (MAG) 31, which consists of seven fighter attack squadrons.

The base has several large fuel storage and supply facilities to provide large quantities of JP-5 for the MAG fighter squadrons and support aircraft. The base also contains numerous above and below ground fuel storage tanks that are used primarily to supply fuel (heating) oil as well as diesel fuel and gasoline for vehicle use. The facility was issued a Hazardous and Solid Waste Amendments (HSWA) permit dated October 30, 1991, which required site-wide corrective action. The HSWA permit expired on October 31, 1996, and a renewal application for hazardous waste storage was submitted in April 1996. A revised Part B application, which included treatment in a miscellaneous unit (thermal treatment for waste military munitions), was submitted in February 1999. The original permit remains in effect until the state of South Carolina issues a renewal permit.

In 1986, Dames and Moore (Bethesda, Maryland) completed an Initial Assessment Study (IAS) at MCAS Beaufort under the Naval Assessment and Control of Installation Pollutants (NACIP) Program. Twenty-two potentially contaminated sites were evaluated and inspected based on information collected from historical records, aerial photographs, and personnel interviews. Each site was investigated for visible or suspected contamination, possible pathways of migration, and potential human or environmental receptors. Based on these evaluations, twelve of the twenty-two sites were recommended

for confirmatory sampling. The Eastern Fire Training Pits (SWMU 12) and the Storm Sewage Drainage Outfall Area (SWMU 16) were among these twelve sites recommended for additional investigations.

In 1985, while the IAS was being prepared, A.T. Kearney, Inc. (Alexandria, Virginia) conducted a RCRA Facility Assessment (RFA) at MCAS Beaufort. The objective of the RFA was to identify all SWMUs and AOCs that presented a potential threat to human health or the environment. Of the 91 sites reviewed, 43 were identified as requiring further action. Twelve of the 43 sites were the same sites identified for confirmatory sampling in the IAS. Negotiations with EPA narrowed the remaining 31 sites to 17 sites. The report presented a list of all the SWMUs and provided recommendations for further investigations at each site.

In 1988, McClelland Engineers prepared a Final Work Plan for a RCRA Facility Investigation (RFI) at MCAS Beaufort. The purpose of the RFI was to investigate the 31 SWMUs and AOCs identified during the 1985 RFA. The RFI Work Plan was never implemented and environmental samples were never collected. However, three sites requiring investigations under this program were added to the list of 12 SWMUs recommended for confirmatory sampling. One of these was SWMU 57, the Marine Air Group (MAG) 31 Product Storage Area.

In 1989, McClelland Engineers conducted a Remedial Investigation/Verification Step (RIVS) at the 12 SWMUs identified during the IAS. The investigations included soil, groundwater, and surface water sampling at each site to determine if contamination concentrations were at levels hazardous to human health or the environment. Based on the analytical results, additional investigations were recommended for 10 of the 12 SWMUs, including SWMU 12.

In 1991, AFF Environmental conducted an Expanded Site Inspection (ESI) at five SWMUs including SWMU 12. The ESI involved collecting soil and groundwater samples from the five SWMUs in order to assess the magnitude and potential impact of contamination on human health and the environment. In 1991, ABB Environmental also prepared a RFI Work plan and a Confirmatory Sampling (CS) Work plan for MCAS Beaufort. The RFI Work plan covered proposed investigations at the 12 SWMUs identified in the 1988 RFI Work plan, including SWMUs 12 and 57. The RFI/CS Work plan discussed conducting field investigations at five additional SWMUs, including SWMU 17 and 67 and AOC C. The analytical tests recommended included Appendix IX parameters, TCL for VOCs, SVOCs, pesticides, TAL inorganics, and dioxins.

SWMU 12 (Eastern Fire Training Pits) has undergone a CS event and Addendum to CS event, and no source area has been identified. However, there are detections of metals, and VOCs in groundwater. SWMU 67 is the MCAS base permitted wastewater treatment facility that is regulated under a NPDES permit. AOC C (Mop wash area) has undergone an RFI, and no soil contamination was identified. Metals and VOC concentrations in one groundwater well are cause for additional groundwater investigation. SWMU 17 (Funa Futi) has undergone a CS and additional investigation, and no soil or groundwater

contamination was found. SWMU 16 (Storm Sewer Drainage and Outfall) is the base permitted storm sewer discharge point. A CS was conducted at SWMU 57 (MAG-31 Product Storage Area) and subsequently a No Further Action determination was issued.

IV. CONCLUSION FOR CA725

As outlined in Attachment 1, there are currently no complete human health exposure pathways to contamination at the MCAS. This conclusion is based on current conditions and data, and is summarized for soil, sediment, groundwater, surface water, and air media below.

Soil and Sediment

Soil and sediments have been impacted in the past by contamination from SWMUs at MCAS. Eleven SWMUs (SWMUs 1, 2, 3, 4, 5, 6, 8, 14, 76, 77, and AOC P) at the MCAS were identified as needing to have signs posted. SWMUs 1, 2, 3, 4, 8, 14, 76, and AOC P are identified as landfills and disposal areas. The MCAS is currently completing the delineation of the nature and extent of contamination at these sites. These investigations include detailing the current available cover, mapping surface debris, and sediment sampling. This work will be used to support a final corrective action. SWMU 5 is a pesticide residue pit area where residual pesticide contamination is present. Currently additional investigation is necessary to determine the area requiring corrective action. SWMU 6 is identified as the Seepage Trenches associated with SWMU 14, and is currently undergoing a Phased RFI to determine the extent of organic and inorganic contamination. SWMU 77 was recently identified as an Acid Neutralization Pit, and is currently undergoing Confirmatory Sampling. During the investigation at these SWMUs and AOC, exposure to contamination has been controlled through the implementation of an Interim Measure work plan for the installation of signs to identify the sites as SWMUs and or AOCs and notification of the potential environmental hazard. In addition to the installation of signs, several sites will have locked fencing or gates to provide additional protection against human exposure. These include SWMUs 1, 2, 5, 6, 14, and AOC P. Based on the implementation of the Interim Measure work plan for sign placement at these SWMUs and the controlled access to the sites, there is no known threat to human health.

Groundwater

Investigations have shown that groundwater is contaminated at the following sites:
SWMU 1&2 (metals), SWMU 3 (VOCs), SWMU 4 (metals), SWMU 5 (VOCs, SVOCs, metals, and pesticides), SWMU 6&14 (metals, SVOCs, and VOCs)
SWMU 8 (metals), SWMU 9 (metals), SWMU 12 (metals, SVOCs, and VOCs),
SWMU 17 (metals), AOC C (metals and VOCs)

However, the groundwater currently is not being used as a drinking water source or as an irrigation source for crops, fruits, or vegetables at the Base, and therefore does not pose a

threat to human health. Additionally, the facility has land use controls in place, which require digging permits and approval from the facility environmental office prior to land disturbance at this site.

Surface Water

Surface water in the vicinity of many SWMUs where contaminated groundwater exists consists of tidal salt marshes. Groundwater sampling results have not shown contamination above relevant human health action levels, that would cause concern that discharge to surface water would be above relevant human health action levels.

Air

Releases to air from soil, groundwater, sediments, and/or surface water contaminated by SWMUs or AOCs at MCAS are not known to have occurred or be occurring above relevant action levels.

Based on the information provided above, it is recommended that CA725 YE be entered into RCRA Info for the MCAS.

V. CONCLUSION FOR CA750

Investigations have shown that groundwater is contaminated at the following sites: SWMU 1&2 (metals), SWMU 3 (VOCs), SWMU 4 (metals), SWMU 5 (VOC/SVOC, metals, and pesticides), SWMU 6&14 (metals and VOC/SVOC) SWMU 8 (metals), SWMU 9 (metals), SWMU 12 (metals and VOC/SVOC), SWMU 17 (metals), AOC C (metals and VOCs). Based on the above information, it is recommended that CA750 NO remain in RCRA Info for the MCAS.

VI. SUMMARY OF FOLLOW-UP ACTIONS (Discussion of What is Needed to Get to Yes, with EI Interim Milestone Schedule)

A. CA750 - Groundwater data was collected to delineate the extent of contamination and to determine whether contaminated groundwater is migrating.

- SWMU 1 - Based on current sampling data there is low-level metals contamination that is above regulatory levels. There is insufficient information to determine the extent of VOC, SVOC, and metal, contamination. Additional groundwater sampling is required.

- SWMU 2 - Based on current sampling data, there is low-level metals contamination that is above regulatory levels. There is insufficient information to determine the extent of VOC, SVOC, and metal contamination. Additional groundwater investigation is required, to include installation of wells and monitoring.
- SWMU 3- Based on current information, there is insufficient information to determine the presence or absence of contamination. The site history suggests concern for groundwater contamination. Groundwater sampling is required.
- SWMU 4- Based on current sampling data; there is low-level VOC contamination. There is insufficient information to determine the extent of VOC, SVOC, and metal contamination. Additional groundwater investigation is required, to include installation of wells and monitoring.
- SWMU 5- Based on current sampling data, there is low-level metal, VOC, SVOC, and pesticide contamination above regulatory levels. There is insufficient information to determine the extent of metal, VOC, SVOC, and pesticide contamination. Additional groundwater investigation is required, to include installation of wells and monitoring.
- SWMU 6/14- Based on past data, there is low-level metal, VOC, and SVOC contamination above regulatory levels. There is insufficient information to determine the extent of metal, VOC, SVOC, and pesticide contamination. Additional groundwater investigation is required, to include installation of wells and monitoring.
- SWMU 8 - Based on past data, there is low-level metals contamination. There is insufficient information to determine the presence of VOC and SVOC contamination. There is currently a RFI work plan in place for additional groundwater wells and monitoring.
- SWMU 9- Based on past data, there is low-level metals contamination at regulatory levels. A revised RFI Report is required.
- SWMU 12 – Based on past data there is low-level metal, VOC, and SVOC contamination. There is insufficient information to determine the extent of VOC, SVOC, and metal contamination. Additional groundwater sampling is required.
- SWMU 17- Based on past data, there is low-level metals contamination at regulatory levels. A revised CS Report is required.
- AOC-C - Based on current sampling data, there is VOC and metal contamination is above current MCLs. Additional investigation and monitoring wells are required.

- AOC-P – Based on current information, there is insufficient information to determine the presence or absence of contamination. The site history suggests concern for groundwater contamination. Groundwater sampling is required.

Marine Corps Air Station EI Interim Milestone Schedule CA750			
Activity	CA RCRA Info Event Code	Scheduled Date (Qtr&FY)	Remarks
SWMU 3 RFI Report received	CA 190XG	3/30/05	
SWMU 5 RFI Report received	CA 190XG	3/30/05	
SWMU 4 RFI Report received	CA 190XG	3/30/05	
SWMU 9 RFI Report received	CA 190XG	9/30/05	
SWMU 6/14 RFI Report received	CA 190XG	3/30/05	
SWMU 17 CS Report received	CA 107XG	3/30/04	
AOC C CMS Approved	CA350XG	9/30/04	
SWMU 8 IM Report Received	CA 640XG	12/31/04	
SWMU 8 IM Work plan received	CA 610XG	10/31/04	
AOC P RFI Report received	CA 190XG	12/31/04	
AOC P IM Work plan received	CA 610XG	3/31/04	
SWMU 8 RFI Report received	CA 190XG	6/30/04	
SWMU 2 IM Work plan received	CA 610XG	6/30/04	
SWMU 2 IM Work plan received	CA 610XG	6/30/04	
AOC C CMI Work plan approved	CA 500XG	6/30/04	
AOC P RFI Work plan received	CA110XG	6/30/04	
SWMU 12 CMS Approved	CA350XG	6/30/04	
AOC C Stabilization Measures Implemented	CA 600XG	6/30/04	
SWMU 1 IM Report Received	CA 640XG	9/30/04	
SWMU 2 IM Report	CA 640XG	9/30/04	

Received			
SWMU 12 Stabilization Measures Implemented	CA 600XG	9/30/04	
SWMU 12 CMI Work Plan Approved	CA 500XG	9/30/04	
AOC P IM Report Received	CA640XG	12/31/04	
Migration of Contaminated Groundwater Under Control	CA750	3/31/05	Revised EI Memorandum

VII. LEVEL OF CONFIDENCE IN REACHING A POSITIVE EI EVALUATION AND MAJOR ISSUES

The Department feels reasonably confident that the facility can achieve a CA750 YE determination in 2005, provided that funding is obtained by the Navy to concentrate on determining the current extent of contamination and implements an Interim Measure to control the migration of contaminated groundwater at this site.

Attachment 1

DOCUMENTATION OF ENVIRONMENTAL
INDICATOR DETERMINATION
CA 725

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA725)

Facility Name: Marine Corps Air Station
 Facility Address: Highway 21
Beaufort, South Carolina, 29904
 Facility EPA ID#: SC1 750 216 169
 Updated: January 20, 2004

- Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g. from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)) been considered in this EI Determination?

Yes.

- Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be “**contaminated**” above appropriately protective risk-based “levels” (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs, or AOCs)?

<u>Media</u>	<u>Yes</u>	<u>No</u>	<u>?</u>	Rationale/Key Contaminants
Groundwater	<u>X</u>			Metals, Vocs, pesticides
Air (Indoors)		<u>X</u>		
Surface Soil (<2ft)	<u>X</u>			PaH's, pesticides, metals, VOCs
Surface water		<u>X</u>		
Sediment	<u>X</u>			PaH's, pesticides, metals, VOCs
Subsurf. Soil (>2ft)	<u>X</u>			Metals, VOCs, SVOCs, pesticides,
Air (Outdoors)		<u>X</u>		See comment (2)

Rationale and Reference(s):

Comment 1. The key contaminant listing for groundwater, surface soils, sediments, and subsurface soils is not inclusive. These are the primary contaminates. Each SWMU and AOC has a separate list of Contaminants of Potential Concern (COPCs) and Contaminants of Concern (COCs).

Comment 2. Marine Corps Air Station has regulated air emission sources, and has obtained a Title V permit.

3. Are there **complete pathways** between “contamination” and human receptors such that exposures can be reasonable expected under the (land-and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table
Potential **Human Receptors** (Under Current Conditions)

<u>Contaminated Media</u>	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food ¹
Groundwater	No	No	No	Yes	No	No	No
Air (indoors)	No	No	No	No	No	No	No
Soil (<2ft)	No	Yes	No	Yes	Yes	No	No
Surface water	No	No	No	No	No	No	No
Sediment	No	Yes	No	Yes	Yes	No	No
Soil (>2)	No	No	No	Yes	No	No	No
Air (outdoors)	--	--	--	--	--	--	--

¹ Food production is not currently practiced at MCAS. Fishing advisories, if needed, are issued by the South Carolina Department of Natural Resources (SCDNR).

Rationale and References:

Groundwater: Groundwater is not used as a potable water source. Potable water is provided by the Beaufort-Jasper Sewer Water Authority. Therefore only construction workers have a reasonable exposure to the superficial aquifer.

Air (indoors): There is currently no evidence of contamination in the vicinity of buildings that would cause concern for indoor air quality.

Surface Soil (<2ft): Surface soil contamination exists at several SWMUs/AOCs at the MCAS. Due to the location of the SMWUs/AOCs within the MCAS, only workers, construction workers, and trespassers have a reasonable exposure to surface soils.

Surface water: Surface water in the vicinity of many SWMUs where contaminated groundwater exists consists of tidal salt marshes. Groundwater sampling results have not shown contamination above relevant human health action levels, that would cause concern that discharge to surface water would be above relevant human health action levels.

Sediments: Sediment contamination exists at several SWMUs/AOCs at the MCAS. Due to the location of the SMWUs/AOCs within the MCAS, only workers, construction workers, trespassers, and recreational users have a reasonable exposure to sediments.

Subsurface soils: Only construction workers have a reasonable exposure to contaminated subsurface soils.

Air (outdoors): There are only regulated active air emission sources from the US Navy at the MCAS.

- 4 Can the **exposure** from any of the complete pathways identified in #3 be reasonably expected to be “**significant**” (i.e., potentially “unacceptable” because exposure can be reasonably expected to be: 1) greater in magnitude (intensity, frequency, and/or duration) than assumed in the derivation of the acceptable “levels” (used to identify the “contamination”); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable “levels”) could result in the greater acceptable risk)?

If **NO** (exposure can not be reasonable expected to be significant (i.e., potentially “unacceptable”) for any complete pathway) – skip to #6 and enter “YE” status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to “contamination: (identified in #3) are not expected to “be significant”.

XXX If **YES** (exposures could be reasonably expected to be “significant” (i.e., potentially “unacceptable”) for any complete exposure pathway) – continue after providing a description (of each potentially “unacceptable” exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to “contamination” (identified in #3) are not expected to be “significant.

_____ If unknown (for any complete pathway) – skip to #6 and enter “IN” status code.

Rationale and Reference(s):

Exposure pathways are complete only for the construction worker, the trespasser, and worker. For the Construction worker the complete exposure pathways are for groundwater, surface soils, and subsurface soils. For the trespasser the complete exposure pathway is for surface soils and sediment. The worker is reasonably expected to be exposed to only surface soils.

Construction worker exposure to groundwater, surface soils, and subsurface soils is control by:

- All construction work in areas that are known or suspect SWMUs or AOCs requires prior Navy approval, in writing, before the work begins. Part of the

approval process includes identifying known and suspected areas of contamination, listing the suspected contamination, and stating how exposure to the contaminant will be controlled (i.e., personal protection equipment (PPE), engineering controls, etc.)

Therefore, the construction worker exposure is not considered significant.

Trespasser exposure to surface soils is controlled by:

- All of MCAS is fenced and patrolled by security guards. Access to MCAS is limited during normal working hours to those without a specific work location.
- Areas with significant contaminated soils within MCAS are further isolated by locked gates, groundcover such as turf grasses, roads, parking lots, and/or posted signs.

Therefore, the trespasser exposure to surface soils is not considered significant.

Worker exposure to surface soils is controlled by:

- Areas with significant contaminated soils within MCAS are further isolated by locked gates, groundcover such as turf grasses, roads, parking lots, and/or posted signs.
- Additionally, all construction work in areas that are known or suspect SWMUs or AOCs requires prior Navy approval, in writing, before the work begins. Part of the approval process includes identifying known and suspected areas of contamination, listing the suspected contamination, and stating how exposure to the contaminant will be controlled (i.e., personal protection equipment (PPE), engineering controls, etc)

Therefore, the worker exposure to surface soils is not considered significant.

6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA 725), and obtain Supervisor (or appropriate Manager) signature and the date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

XXX YE – Yes, “Current Human Exposures Under Control” has been verified. Based on a review of the information contained in this EI Determination, “Current Human Exposures” are expected to be “Under Control” at the Marine Corps Air Station, EPA ID# SC1 750 216 169, located in Beaufort, South Carolina under current and reasonably expected

conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes.

___ NO – “Current Human Exposures” are NOT “Under Control.”

___ IN- More information is needed to make a determination.

Completed by Stacey French Date 1/20/04
Stacey French, P.E., DoD Site Coordinator
Corrective Action Engineering Section
South Carolina Department of Health and Environmental
Control

Supervisor David Scaturo Date 1-20-04
David Scaturo, P.E., P.G., Manager
Corrective Action Engineering Section
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